

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
CASE NO.3: 23-cv- 00414

HALEEM GILLILAND,

Plaintiff,

v.

GARRY L. MCFADDEN, individually  
and in his official capacity as Sheriff of  
Mecklenburg County; PLATTE RIVER  
INSURANCE COMPANY, a  
corporation in its capacity as Surety on  
the official bond of the Sheriff of  
Mecklenburg County and KYLE  
GARRETT HARRIS, individually and  
in his official capacity as a Detention  
Officer of Mecklenburg County

Defendants

**CONSENT MOTION FOR ORDER  
ALLOWING DEPOSITION OF  
PRE-TRIAL DETAINEE**

Defendants hereby move for an Order authorizing Plaintiff to be deposed in the Fulton County Jail in Atlanta, Georgia pursuant to Rule 30(a)(2)(b) of the Federal Rules of Civil Procedure. Plaintiff's counsel consents to this Motion.

This Motion is based upon the Court file and records in this action, the accompanying Memorandum, and upon such additional evidence which may be presented at or before any hearing which may be set by the Court.

This 15<sup>TH</sup> day of February, 2024.

s/Sean F. Perrin  
/s/ Marilyn Porter  
/s/ J. George Guise

*Counsel for Defendants Garry McFadden in  
his official and individual capacity, Platte  
River Insurance Company, and Kyle Harris  
in his official capacity only.*

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of February, 2024, a copy of the foregoing was filed via CM/ ECF and a copy was sent via U.S. Mail to the following non CM/ ECF participant:

Kyle Garrett Harris  
Inmate # 1693707  
Warren Correctional Institution  
Post Office Box 728  
Norlina, NC 27563

s/Sean F. Perrin